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To: Harry Stoller, Illinois Commerce Commission

CC: Michelle Mishoe, Illinois Commerce Commission

From: Michael Stavy, Independent Consulting Energy Economist

Date: April 26, 2005

RE: Comments on the implementation plans presented at the second round of the working group meetings concerning the Renewable Electric Portfolio Standard in Governor Blagojevich's Proposed Sustainable Energy Plan for Illinois

I appreciate the opportunity to publicly comment to the Illinois Commerce Commission (Commission) on the above cited implementation plans.

I assume that the major purpose of the Renewable Electric Portfolio Standard (RPS) in Governor Blagojevich's Sustainable Energy Plan for Illinois is to reduce the amount of greenhouse gases that Illinois emits in the generation of electric energy and the amount of nuclear waste generated and/or stored in Illinois. The Governor's RPS will require that by 2012 at least 8% of the electricity supplied to retail customers be generated by renewable sources.

Currently each Illinois electric utility (EU) and alternative retail electric provider (ARES) is required to disclose the source of its electric generation. (Environmental Disclosure Statement under section 16-127 of the Electric Customer Choice Rate Relief Law of 1997 and the rules of the ICC, 83 ILL Admn. Code 421) This disclosure is done as a percentage of total retail electric energy (MWh/year) that each Illinois EU or ARES sells in Illinois each year. Each Illinois EU and ARES is also required to disclose, on a yearly basis, the average amount of air emissions (lbs-emissions/MWh/yr) for carbon dioxide (CO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>). Each Illinois EU and ARES is further required to disclose, on a yearly basis, the amount of both high level (lbs-waste/MWh/yr) and low level (cubic feet-waste/MWh/yr) nuclear waste produced.

March 26, 2005

In the implementation plan for the Governor's RPS, I suggest that the Commission modify the current required Environmental Disclosure Statement to require the disclosure of

- a. both the actual and, where applicable, the required %/yr of each source of electric energy.
- b. both the actual and, where applicable, the required MWh/yr from each source of electric energy.
- c. by source of electric energy, each EU's and ARES' import and export of electric energy (MWh/yr) in the interstate wholesale market.
- d. the yearly average amount of air pollutants (CO<sub>2</sub>, NO<sub>x</sub> and SO<sub>2</sub>) per MWh.
- e. the yearly average amount of nuclear wastes per MWh.
- f. the yearly total amount of nuclear waste generated in Illinois, stored in Illinois and removed from storage in Illinois.

All my suggested disclosure modifications "a→f" above, but especially "d→f" should be presented in time series format.

In implementing the Governor's RPS plan, I also suggest that the Commission combine all the individual EU's and ARES' required Environmental Disclosure Statements into a time series based aggregate annual Environmental Disclosure Statement for the entire state of Illinois.

If the major purpose of Governor Blagojevich's RPS is to reduce the amount of greenhouse gases that Illinois emits each year in the generation and use of electric energy, I further suggest that the Illinois' Aggregate Environmental Disclosure Statement be presented in both the current units of measurement and in the units of measurement required under the Kyoto Protocol.

If the Commission needs any further explanation, please contact me.

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